

EXHIBIT K

From: Bassett, Nicholas <nicholasbassett@paulhastings.com>
Sent: Wednesday, September 4, 2019 3:43 PM
To: Mashberg, Gregg M.; McKeen, Elizabeth L.
Cc: lucdespins@paulhastings.com; Worthington, James B.
Subject: PREPA Discovery

[EXTERNAL MESSAGE]

Gregg and Liz,

Following up on our call, and as I just informed Gregg separately, after further consideration and in an effort to avoid motion practice, the Committee has decided that it will withdraw its pending document requests and Rule 30(b)(6) deposition notices relating to BDO. The Committee is not, however, prepared to withdraw its deposition notice directed to Jose Ortiz.

As I mentioned on the call, we believe it would be most efficient for PREPA to refrain from engaging in motion practice relating to Mr. Ortiz's deposition until after the Court has issued a decision on the Committee's pending objection to Judge Dein's August 2 order. If PREPA nevertheless plans to file a motion for protective order today, please let me know.

With respect to the litigation schedule, I have conferred with the Fuel Line Lenders' counsel regarding the issues we discussed and hope to get back to you shortly. Please let me know once the Government Parties have decided how long they need to complete the remaining document productions called for by the August 2 order and are prepared to continue discussing an extension of the schedule.

Regards,
Nick

Nick Bassett | Of Counsel



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